

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SilverRock Development Company, *et al.*,
Debtors.¹

Chapter 11
Case No. 24-11647 (MFW)
(Jointly Administered)

RE: D.I. 358

**NOTICE OF FILING OF REVISED PROPOSED ORDER
APPROVING BIDDING PROCEDURES MOTION**

PLEASE TAKE NOTICE that, on February 19, 2025, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Motion for Entry of Order (I) Authorizing and Approving (A) Bid Procedures and (B) Form and Manner of Notice of Bid Procedures* [D.I. 358] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion is scheduled for March 12, 2025, at 10:30 a.m. (ET).

PLEASE TAKE FURTHER NOTICE that the Debtors have been working with various constituencies to address their concerns with the proposed order approving the Motion (the “Proposed Order”).

PLEASE TAKE FURTHER NOTICE that a clean version of the revised Proposed Order is attached hereto as Exhibit A.

¹The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: SilverRock Development Company, LLC (5730), RGC PA 789, LLC (5996), SilverRock Lifestyle Residences, LLC (0721), SilverRock Lodging, LLC, (4493), SilverRock Luxury Residences, LLC (6598) and SilverRock Phase 1, LLC (2247). The location of the Debtors’ principal place of business and the Debtors’ mailing address is 343 Fourth Avenue, San Diego, CA 92101.

PLEASE TAKE FURTHER NOTICE that a redline version of the revised Proposed Order is attached hereto as **Exhibit B.**

Dated: March 12, 2025
Wilmington, Delaware

ARMSTRONG TEASDALE, LLP

/s/ Jonathan M. Stemerman

Jonathan M. Stemerman (No. 4510)
Eric M. Sutty (No. 4007)
Denisse Guevara (No. 7206)
1007 North Market Street, Third Floor
Wilmington, Delaware 19801
Telephone: (302) 416-9670
jstemerman@atllp.com
esutty@atllp.com
dguevara@atllp.com

-and-

Victor A. Vilaplana (*Pro Hac Vice*)
823 La Jolla Rancho Road
La Jolla, CA 92037
Telephone: (619) 840-4130
vavilaplana@gmail.com

-and-

Benjamin M. Carson (*Pro Hac Vice*)
5965 Village Way STE E105
San Diego, CA 92130
Telephone: (858) 255-4529
ben@benjamincarson.com

*Counsel to the Debtors
and Debtors in Possession*